

EXCEPTION

EXCEPTION 60

BellSouth Florida OSS Testing Evaluation

Date: May 21, 2001

EXCEPTION REPORT

An observation has been identified as a result of test activities associated with the Functional Carrier Bill Evaluation Test (TVV11).

EXCEPTION:

BellSouth failed to cease billing on disconnected auxiliary lines. (TVV11)

Issue:

BellSouth produced bills that contained a variety of service activities associated with service orders placed by KPMG Consulting. A number of billing invoices received by KPMG Consulting contained recurring charges for UNE ports for lines that were disconnected.

BellSouth continued to bill monthly recurring charges of \$14.90 for the network element UEPLX for lines that had been disconnected.

Representative occurrences of this issue are found on the invoices with the following billing information:

Account Number	Billing TN	Invoice Date
904 Q59-0568-568	352-490-7959	03/29/01
561 Q59-0568-568	561-832-1972	03/29/01
904 Q59-0568-568	352-490-7959	04/29/01
561 Q59-0568-568	561-832-1972	04/29/01

Impact:

Issuing bills containing erroneous or inappropriate billing information could impact a CLEC's ability to assess or project revenue accurately. A CLEC may project revenue based on its documented service inventory without taking into account unknown expenses emanating from being inappropriately billed by BellSouth. As a result, it could affect a CLEC's business operations, including budgetary planning and resource management.

FLORIDA OSS BELLSOUTH'S RESPONSE TO EXCEPTION 60



Florida OSS Test
Exception 60

June 11, 2001

EXCEPTION REPORT

BellSouth failed to cease billing on disconnected auxiliary lines. (TVV11)

Issue:

BellSouth produced bills that contained a variety of service activities associated with service orders placed by KPMG Consulting. A number of billing invoices received by KPMG Consulting contained recurring charges for UNE ports for lines that were disconnected.

BellSouth continued to bill monthly recurring charges of \$14.90 for the network element UEPLX for lines that had been disconnected.

Representative occurrences of this issue are found on the invoices with the following billing information:

Account Number	Billing TN	Invoice Date
904 Q59-0568-568	352-490-7959	03/29/01
561 Q59-0568-568	561-832-1972	03/29/01
904 Q59-0568-568	352-490-7959	04/29/01
561 Q59-0568-568	561-832-1972	04/29/01

Impact:

Issuing bills containing erroneous or inappropriate billing information could impact a CLEC's ability to assess or project revenue accurately. A CLEC may project revenue based on its documented service inventory without taking into account unknown expenses emanating from being inappropriately billed by BellSouth. As a result, it could affect a CLEC's business operations, including budgetary planning and resource management.

BellSouth Response:

The two accounts identified in the table above were billed due to an ordering system defect that failed to remove UEPLX from the account. Only the electronically submitted partial disconnect orders with REQ TYP M /ACT C, P or Q and LNA of D that did not fall out for manual handling were impacted by this defect. The ordering system defect

FLORIDA OSS BELLSOUTH'S RESPONSE TO EXCEPTION 60

was corrected on 04/07/01. The accounts have been corrected and KPMG will receive a credit on the 06/29/01 bill.

EXCEPTION

EXCEPTION 62

BellSouth Florida OSS Testing Evaluation

Date: May 23, 2001

EXCEPTION REPORT

An exception has been identified as a result of test activities associated with the Functional Carrier Bill Evaluation Test (TVV11).

EXCEPTION:

BellSouth bills reflect a rate for a Service Order Mechanized Charge that is inconsistent with the rate contained in the Interconnection Agreement (IA) between BellSouth Telecommunications and the KPMG CLEC. (TVV11)

Issue:

The KPMG CLEC placed Local Service Requests (LSRs) for a variety of services via a mechanized interface. LSRs placed through a mechanized interface are subject to a non-recurring charge, denoted by the Universal Service Order Code (USOC) SOMECH. The applicable rate for this USOC is contained in the Interconnection Agreement (IA) signed by BellSouth Telecommunications and the KPMG CLEC. BellSouth bills reflect a rate for this USOC that is inconsistent with the rate contained in the IA.

According to the updated rate table dated October 27, 2000, contained in the IA, the applicable rate for mechanized Local Service Request (LSR) via a mechanized interface is \$2.75 per LSR. KPMG CLEC continues to receive billing invoices that reflect a SOMECH charge of \$3.50 per LSR. This charge represents the charge listed in the previous rate table that was published prior to the current rate table.

Representative occurrences of this issue are found on the invoices with the following billing information:

Service Order	Account Number	Telephone Number	Invoice Date
CY68BQ02	904 Q59-0568-568	352-490-7959	12/29/00
NQCXMVD8A	305 Q89-0961-961	305-358-3970	04/19/01
NY78GG25A	904 Q97-2336-336	904-598-1753	04/17/01
DYR5N011A	904 Q59-4649-649	904-353-3952	03/29/01
NY6F8PK3	904 Q97-2336-336	352-490-5547	12/17/00
NYFT7LL8A	904 Q97-2336-336	352-490-5916	12/17/00

EXCEPTION 62

BellSouth Florida OSS Testing Evaluation

Impact:

The Interconnection Agreement and the BellSouth Intra-State and Inter-State tariff documentation contains all applicable rates or charges that could be assessed to the BellSouth trading partners (CLECs). By not adhering to the rates or charges published in the rate documentation, a CLEC's operating costs are misquoted and the budgetary planning and revenue could be affected.

FLORIDA OSS BELL SOUTH'S RESPONSE TO EXCEPTION 52



Florida OSS Test
Exception 62

June 5, 2001

EXCEPTION REPORT

An exception has been identified as a result of test activities associated with the Functional Carrier Bill Evaluation Test (TVV11).

EXCEPTION:

BellSouth bills reflect a rate for a Service Order Mechanized Charge that is inconsistent with the rate contained in the Interconnection Agreement (IA) between BellSouth Telecommunications and the KPMG CLEC. (TVV11)

Issue:

The KPMG CLEC placed Local Service Requests (LSRs) for a variety of services via a mechanized interface. LSRs placed through a mechanized interface are subject to a non-recurring charge, denoted by the Universal Service Order Code (USOC) SOMECH. The applicable rate for this USOC is contained in the Interconnection Agreement (IA) signed by BellSouth Telecommunications and the KPMG CLEC. BellSouth bills reflect a rate for this USOC that is inconsistent with the rate contained in the IA.

According to the updated rate table dated October 27, 2000, contained in the IA, the applicable rate for mechanized Local Service Request (LSR) via a mechanized interface is \$2.75 per LSR. KPMG CLEC continues to receive billing invoices that reflect a SOMECH charge of \$3.50 per LSR. This charge represents the charge listed in the previous rate table that was published prior to the current rate table.

Representative occurrences of this issue are found on the invoices with the following billing information:

Service Order	Account Number	Telephone Number	Invoice Date
CY68BQ02	904 Q59-0568-568	352-490-7959	12/29/00
NQCXMVD8A	305 Q89-0961-961	305-358-3970	04/19/01
NY78GG25A	904 Q97-2336-336	904-598-1753	04/17/01
DYR5N011A	904 Q59-4649-649	904-353-3952	03/29/01
NY6F8PK3	904 Q97-2336-336	352-490-5547	12/17/00
NYFT7LL8A	904 Q97-2336-336	352-490-5916	12/17/00

FLORIDA OSS BELLSOUTH'S RESPONSE TO EXCEPTION 52

Impact:

The Interconnection Agreement and the BellSouth Intra-State and Inter-State tariff documentation contains all applicable rates or charges that could be assessed to the BellSouth trading partners (CLECs). By not adhering to the rates or charges published in the rate documentation, a CLEC's operating costs are misquoted and the budgetary planning and revenue could be affected.

BellSouth Response:

BellSouth's Interconnection Agreements (IAs) have contract language that address pricing as well as rate tables that contain rates for services that CLECs can order. Both the contract language and the rates contained in the rate tables govern the relationship between BellSouth and a CLEC. In cases where the language and the rates in the rate table conflict, the parties would need to execute an amendment to correct such incongruities.

The 10/24/00 amendment to the 10/19/00 IA for CKS in the state of Florida replaced the rate table for rate elements available for ordering as unbundled network elements, and did not revise the contract language for OSS at the same time. The rate table in the amendment contains OSS rates that vary from the rates specified in the 10/19/00 IA contract language for the USOCs SOMEK and SOMAN. [NOTE: The 10/19/00 IA contract language states that OSS charges will apply at \$3.50 per Local Service Request (LSR) submitted electronically and at \$19.99 per LSR submitted manually in the state of Florida.]

The existing contract language reference to rates of \$3.50 and \$19.99 is correct and the OSS SOMEK and SOMAN rates contained in the rate table per the amendment should not have been listed. The rate table can be corrected via an amendment to the IA.

FLORIDA OSS BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 62



Florida OSS Test
Exception 62

October 3, 2001

EXCEPTION REPORT

An exception has been identified as a result of test activities associated with the Functional Carrier Bill Evaluation Test (TVV11).

EXCEPTION:

BellSouth bills reflect a rate for a Service Order Mechanized Charge that is inconsistent with the rate contained in the Interconnection Agreement (IA) between BellSouth Telecommunications and the KPMG CLEC. (TVV11)

Issue:

The KPMG CLEC placed Local Service Requests (LSRs) for a variety of services via a mechanized interface. LSRs placed through a mechanized interface are subject to a non-recurring charge, denoted by the Universal Service Order Code (USOC) SOMECH. The applicable rate for this USOC is contained in the Interconnection Agreement (IA) signed by BellSouth Telecommunications and the KPMG CLEC. BellSouth bills reflect a rate for this USOC that is inconsistent with the rate contained in the IA.

According to the updated rate table dated October 27, 2000, contained in the IA, the applicable rate for mechanized Local Service Request (LSR) via a mechanized interface is \$2.75 per LSR. KPMG CLEC continues to receive billing invoices that reflect a SOMECH charge of \$3.50 per LSR. This charge represents the charge listed in the previous rate table that was published prior to the current rate table.

Representative occurrences of this issue are found on the invoices with the following billing information:

<u>Service Order</u>	<u>Account Number</u>	<u>Telephone Number</u>	<u>Invoice Date</u>
CY68BQ02	904 Q59-0568-568	352-490-7959	12/29/00
NQCXMVD8A	305 Q89-0961-961	305-358-3970	04/19/01
NY78GG25A	904 Q97-2336-336	904-598-1753	04/17/01
DYR5N011A	904 Q59-4649-649	904-353-3952	03/29/01
NY6F8PK3	904 Q97-2336-336	352-490-5547	12/17/00
NYFT7LL8A	904 Q97-2336-336	352-490-5916	12/17/00

FLORIDA OSS BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 62

Impact:

The Interconnection Agreement and the BellSouth Intra-State and Inter-State tariff documentation contains all applicable rates or charges that could be assessed to the BellSouth trading partners (CLECs). By not adhering to the rates or charges published in the rate documentation, a CLEC's operating costs are misquoted and the budgetary planning and revenue could be affected.

BellSouth Response:

BellSouth's Interconnection Agreements (IAs) have contract language that address pricing as well as rate tables that contain rates for services that CLECs can order. Both the contract language and the rates contained in the rate tables govern the relationship between BellSouth and a CLEC. In cases where the language and the rates in the rate table conflict, the parties would need to execute an amendment to correct such incongruities.

The 10/24/00 amendment to the 10/19/00 IA for CKS in the state of Florida replaced the rate table for rate elements available for ordering as unbundled network elements, and did not revise the contract language for OSS at the same time. The rate table in the amendment contains OSS rates that vary from the rates specified in the 10/19/00 IA contract language for the USOCs SOMEK and SOMAN. [NOTE: The 10/19/00 IA contract language states that OSS charges will apply at \$3.50 per Local Service Request (LSR) submitted electronically and at \$19.99 per LSR submitted manually in the state of Florida.]

The existing contract language reference to rates of \$3.50 and \$19.99 is correct and the OSS SOMEK and SOMAN rates contained in the rate table per the amendment should not have been listed. The rate table can be corrected via an amendment to the IA.

BellSouth Amended Response:

Following KPMG's review of the document entitled BellSouth's Process for the Management, Review, and Sign-Off of UNE Rates, KPMG submitted clarification questions on September 21, 2001. In response to the issues and questions raised, BellSouth submits the following answers, along with a revised version of the document.

KPMG Issue #1: There is no subheading for "Executed Agreements" and no discussion of associated controls.

See Section VII, page 16. BellSouth has added a section entitled *Establishment of a New Executed Agreement*. This section describes the process, controls, and stakeholders associated with the executed agreement.

FLORIDA OSS BELL SOUTH'S AMENDED RESPONSE TO EXCEPTION 62

KPMG Issue #2: There is no discussion of rate changes that go beyond table updates. How does BellSouth test and control changes that affect the way rates are applied (i.e. a rate changes from flat to distance sensitive)?

All rate changes are table updates. BBI updates all rates by use of tables designed for this purpose. These tables have categories that designate whether or not the rate is flat rated, usage sensitive, or distance sensitive. The billing systems then respond to these categories appropriately. The changes KPMG inquires about are managed by way of service order and rely upon the basic class of service USOCs. Specifically, if a rate changed from flat to distance sensitive, one of the following activities would occur:

- **Order activity to remove a flat rate USOC and add a mileage USOC.**
- **Order activity to disconnect the customer account from a flat rated basic class of service and to establish service with a usage sensitive class of service (i.e. changing from circuit billing to usage billing).**
- **If the new service offered is a structure change for the billing system (i.e. no other customers or services are billed in this manner), this change would take place through the work request process and system testing would occur.**

The activities described above do not require a rate change.

KPMG Issue #3: Product Managers often develop new types of discounting to remain competitive. How is the introduction of discounts tested and controlled?

A specially discounted rate is still a rate. The first bullet point on page 17 of the initial document stated, "Product Managers have overall responsibility for all pricing concerns affecting their products." The process for managing, negotiating, and entering a discounted rate is the same for other rates described in the document. However, for purposes of clarity, the first bullet point on page 18 of the revised document has been updated to specify that product manager's overall responsibility for all pricing concerns includes discount rates.

KPMG Issue #4: How does BellSouth ensure that quarterly updates won't affect executed agreements already in place?

This process is described on page 17 of the revised document under the Phase 2-BBI section.

KPMG Issue #5: How does BellSouth ensure that updates to executed agreements affect only the appropriate CLEC and no others.

This process is described on page 17 of the revised document under the Phase 2-BBI section.

FLORIDA OSS BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 62

KPMG Issue #6: Does BBI have a process for ensuring the accuracy of executed agreements?

This process is described on page 17 of the revised document under the Phase 2-BBI section.

EXCEPTION

EXCEPTION 85
BellSouth Florida OSS Testing Evaluation

Date: July 11, 2001**EXCEPTION REPORT**

KPMG Consulting has identified an exception as a result of the POP Functional Evaluation (TVV-1).

Exception:

KPMG Consulting has not received timely mechanized Resale Firm Order Confirmations (FOCs) from BellSouth's Electronic Data Interchange (EDI) interface. (TVV1)

Issue:

According to Ordering O-9 of the Service Quality Measurement Plan¹, BellSouth should return 95% a mechanized Resale FOC to CLECs within three hours of receipt of the Local Service Request (LSR). During production testing of the EDI interface, KPMG Consulting received a number of mechanized Resale FOCs after the three-hour time frame.

The following are the results that KPMG Consulting received as of June 20, 2001 on mechanized Resale FOC timeliness. BellSouth returned 121 of 131 FOCs, or 92%, within the specified interval.

	< 3 hrs	>=3 and <24 hrs	>=24 and <36 hrs	>=36 and <48 hrs	>=48 and <72 hrs	>72 hrs	Total
Number of Transactions	121	9	0	0	0	1	131
Percent	92%	7%	0%	0%	0%	1%	100%

Following is the list of PONs that did not receive a Resale FOC within three hours:

PON	Ver	CC	LSR Sent	FOC Received
018071FPEN100003	00	9993	04/13/01 08:47 AM	04/17/01 05:52 PM

¹ BellSouth OSS Testing Florida Interim Performance Metrics Ver. 3.0, Approved by Florida PSC June 12, 2001

EXCEPTION 85

BellSouth Florida OSS Testing Evaluation

PON	Ver	CC	LSR Sent	FOC Received
012011FPEN000001	00	9993	05/21/01 06:34 PM	05/22/01 12:59 PM
001131FPEN100005	00	9990	04/03/01 11:39 AM	04/03/01 06:11 PM
017021FPEN100006	00	9993	04/03/01 11:39 AM	04/03/01 06:11 PM
002181FPEN100008	00	9990	04/03/01 12:13 PM	04/03/01 06:39 PM
002181FPEN100009	00	9990	04/03/01 12:16 PM	04/03/01 06:39 PM
002181FPEN100003	00	9990	03/23/01 09:12 AM	03/23/01 02:56 PM
001121FPEN100004	00	9990	04/03/01 11:33 AM	04/03/01 03:57 PM
002181FPEN100005	00	9990	04/03/01 12:06 PM	04/03/01 03:57 PM
002191FPEN100006	00	9990	04/03/01 12:37 PM	04/03/01 03:57 PM

Impact:

The receipt of timely Resale FOCs is a critical factor in the CLEC's delivery of service to customers in a timely manner. Delays in the return of FOCs may have a negative impact on the timeliness of the completion of CLEC orders, lowering overall CLEC customer satisfaction.

FLORIDA OSS BELLSOUTH'S RESPONSE TO EXCEPTION 85



Florida OSS Test
Exception #85

Date: July 20, 2001

EXCEPTION REPORT

KPMG Consulting has identified an exception as a result of the POP Functional Evaluation (TVV-1).

Exception:

KPMG Consulting has not received timely mechanized Resale Firm Order Confirmations (FOCs) from BellSouth's Electronic Data Interchange (EDI) interface. (TVV1)

Issue:

According to Ordering O-9 of the Service Quality Measurement Plan¹, BellSouth should return 95% a mechanized Resale FOC to CLECs within three hours of receipt of the Local Service Request (LSR). During production testing of the EDI interface, KPMG Consulting received a number of mechanized Resale FOCs after the three-hour time frame.

The following are the results that KPMG Consulting received as of June 20, 2001 on mechanized Resale FOC timeliness. BellSouth returned 121 of 131 FOCs, or 92%, within the specified interval.

	< 3 hrs	>=3 and <24 hrs	>=24 and <36 hrs	>=36 and <48 hrs	>=48 and <72 hrs	>72 hrs	Total
Number of Transactions	121	9	0	0	0	1	131
Percent	92%	7%	0%	0%	0%	1%	100%

Following is the list of PONs that did not receive a Resale FOC within three hours:

¹ BellSouth OSS Testing Florida Interim Performance Metrics Ver. 3.0, Approved by Florida PSC June 12, 2001

FLORIDA OSS BELLSOUTH'S RESPONSE TO EXCEPTION 85

PON	Ver	CC	LSR Sent	FOC Received	BellSouth Findings
018071FPEN100003	00	9993	04/13/01 08:47 AM	04/17/01 05:52 PM	Disagree. EDI records show that a FOC was translated and placed in a file for transfer to KPMG on 4/13 at 7:55 a.m. EDI records can also validate that a file was sent to KPMG via CONNECT:Direct on 4/13 at 7:55 a.m. Because EDI does not archive copies of the C:D files, we cannot validate that the FOC was in the file.
012011FPEN000001	00	9993	05/21/01 06:34 PM	05/22/01 12:59 PM	A change that was implemented the weekend of 5/18 to a query in the Mercator Launcher TAR file caused files to back up in EDI. This caused delays in some inbound and outbound documents. The problem was resolved at 20:00 on 5/21 and the files were manually processed.
001131FPEN100005	00	9990	04/03/01 11:39 AM	04/03/01 06:11 PM	Unavailability of a system downstream of the service order generator caused files to be requeued. After a predetermined time with no response back to LEO, the files are resent to the service order generator. This unusual situation occurred on 4/3/01, causing the delay.
017021FPEN100006	00	9993	04/03/01 11:39 AM	04/03/01 06:11 PM	Unavailability of a system downstream of the service order generator caused files to be requeued. After a predetermined time with no response back to LEO, the files are resent to the service order generator. This unusual situation occurred on 4/3/01, causing the delay.
002181FPEN100008	00	9990	04/03/01 12:13 PM	04/03/01 06:39 PM	Unavailability of a system downstream of the service order generator caused files to be requeued. After a predetermined time with no response back to LEO, the files are resent to the service order generator. This unusual situation occurred on 4/3/01, causing the delay.
002181FPEN100009	00	9990	04/03/01 12:16 PM	04/03/01 06:39 PM	Unavailability of a system downstream of the service order generator caused files to be requeued. After a predetermined time with no response back to LEO, the files are resent to the service order generator. This unusual situation occurred on 4/3/01, causing the delay.
002181FPEN100003	00	9990	03/23/01 09:12 AM	03/23/01 02:56 PM	FOC document delayed due to a downstream system problem--a JCL error was causing production data to be sent to a test dataset. Condition corrected and data was correctly routed.

FLORIDA OSS BELL SOUTH'S RESPONSE TO EXCEPTION 85

PON	Ver	CC	LSR Sent	FOC Received	BellSouth Findings
001121FPEN100004	00	9990	04/03/01 11:33 AM	04/03/01 03:57 PM	Unavailability of a system downstream of the service order generator caused files to be requeued. After a predetermined time with no response back to LEO, the files are resent to the service order generator. This unusual situation occurred on 4/3/01, causing the delay.
002181FPEN100005	00	9990	04/03/01 12:06 PM	04/03/01 03:57 PM	Unavailability of a system downstream of the service order generator caused files to be requeued. After a predetermined time with no response back to LEO, the files are resent to the service order generator. This unusual situation occurred on 4/3/01, causing the delay.
002191FPEN100006	00	9990	04/03/01 12:37 PM	04/03/01 03:57 PM	Unavailability of a system downstream of the service order generator caused files to be requeued. After a predetermined time with no response back to LEO, the files are resent to the service order generator. This unusual situation occurred on 4/3/01, causing the delay.

Impact:

The receipt of timely Resale FOCs is a critical factor in the CLEC's delivery of service to customers in a timely manner. Delays in the return of FOCs may have a negative impact on the timeliness of the completion of CLEC orders, lowering overall CLEC customer satisfaction.

BellSouth's Response:

Please see BellSouth responses in table above.

(All BellSouth times are Central Standard Times) In summary:

1 PON was returned within the 3-hour timeframe

1 PON was delayed due to an error in an updated Mercator Launcher TAR file query.

1 PON was delayed due to a JCL error causing production data to be sent to a test dataset.

7 PONs were delayed due to system unavailability downstream of the service order generator. (There are several systems downstream of LESOG that, when unavailable, can cause a lengthy requeue/resent situation. Most of the time the requeue of the files allows them to be processed in a timely manner; occasionally, that is not the case--as happened on 04/03/01.)

To summarize, BellSouth contends that 122 of 131 (or 93.1%) of the EDI resale mechanized FOCs were returned in a timely manner.

EXCEPTION

EXCEPTION 86

BellSouth Florida OSS Testing Evaluation

Date: July 16, 2001

EXCEPTION REPORT

KPMG Consulting has identified an exception as a result of the Order "Flow Through" Evaluation (TVV-3).

Exception:

KPMG Consulting did not receive flow through Firm Order Confirmations (FOC) on Local Service Requests (LSR) submitted electronically via the mechanized ordering process. (TVV3)

Issue:

According to Ordering O-3 of the Service Quality Measurement Plan¹, BellSouth should issue a flow through FOC on 95% of residential and 90% of business LSRs submitted through mechanized ordering processes. During production testing of the TAG, EDI and LENS interfaces, a number of LSRs submitted by KPMG Consulting fell out for manual intervention.

The following are the results that KPMG Consulting received as of June 29, 2001 on residential and business LSRs. The number of transactions specifically excludes fatal rejects, auto clarifications, CLEC system fallout and planned manual fallouts for complex orders.

	Residential	Business
Number of Transactions	503	438
Number of Flow Through FOCs	426	389
Percent	85%	89%

Please refer to *FLA Exception 86 Attachment One* for LSRs which fell out for manual intervention.

Impact:

Flow through LSRs are a critical factor in the CLEC's delivery of service to customers in a timely manner. Unexpected manual intervention may cause significant delays in the return of FOCs and may have a negative impact on the timeliness of the completion of CLEC orders, lowering overall CLEC customer satisfaction.

¹ BellSouth OSS Testing Florida Interim Performance Metrics Ver. 3.0, Approved by Florida PSC June 12, 2001

EXCEPTION 86– Attachment One

BellSouth Florida OSS Testing Evaluation

Attachment One

Item #	PON	VER	CC	Level of Disaggregation	BellSouth's Findings
1	001121FPEN100002	00	9990	BUS	Agree.
2	001121FPEN100004	00	9990	BUS	Do Not Agree. LSR was a flow through but was classified as non-flow through. Did not fallout for manual handling. File: KPMGLSR_0401_0430_2001.xls
3	001121FPTN100006	00	9994	BUS	Do Not Agree. LSR was a flow through but was originally classified as non-flow through. Did not fallout for manual handling. Re-run File classified as flow through : KPMGLSR2_0301_0331_2001lsr.xls
4	001121FPTN100007	00	9994	BUS	Do Not Agree. LSR was a flow through but was originally classified as non-flow through. Did not fallout for manual handling. Re-run File classified as flow through : KPMGLSR2_0301_0331_2001lsr.xls
5	005061FPTN101009	00	9990	BUS	Agree.
6	005061FPTN107008	00	9990	BUS	Do Not Agree. LSR was a flow through but was originally classified as non-flow through. Did not fallout for manual handling. Re-run File classified as flow through : KPMGLSR2_0301_0331_2001lsr.xls
7	010051FPTJ100011	00	9993	BUS	Do Not Agree. LSR was a flow through and did not fall out for manual handling. File: KPMGLSR_0301_0331_2001.xls
8	010091FPTN001003	00	9993	BUS	Do Not Agree. LSR was a flow through and did not fall out for manual handling. File: KPMGLSR_0501_0531_2001.xls
9	011121FPEN102001	00	9993	BUS	Agree.
10	011121FPEN102002	00	9993	BUS	Agree.

EXCEPTION 86– Attachment One
BellSouth Florida OSS Testing Evaluation

Item #	PON	VER	CC	Level of Disaggregation	BellSouth's Findings
11	011121FPEN110003	02	9993	BUS	Agree.
12	011121FPTN100006	00	9993	BUS	Do Not Agree. LSR was a flow through and did not fall out for manual handling. File: KPMGLSR_0501_0531_2001.xls
13	011121FPTN101005	00	9993	BUS	Do Not Agree. LSR was a flow through and did not fall out for manual handling. File: KPMGLSR_0501_0531_2001.xls
14	017031FPTN002004	00	9993	BUS	Do Not Agree. LSR was a flow through and did not fall out for manual handling. File: KPMGLSR_0401_0431_2001.xls
15	018042FPEN002001	00	9993	BUS	Agree.
16	020011FPTN100013	00	9990	BUS	Do Not Agree. LSR was a flow through but was originally classified as non-flow through. Did not fallout for manual handling. Re-run File classified as flow through: KPMGLSR2_0301_0331_2001lsr.xls
17	020011FPTN100014	00	9990	BUS	Do Not Agree. LSR was a flow through but was originally classified as non-flow through. Did not fallout for manual handling. Re-run File classified as flow through: KPMGLSR2_0301_0331_2001lsr.xls
18	020011FPTN101011	00	9990	BUS	Do Not Agree. LSR was a flow through but was originally classified as non-flow through. Did not fallout for manual handling. Re-run File classified as flow through: KPMGLSR2_0301_0331_2001lsr.xls
19	020011FPTN101012	00	9990	BUS	Do Not Agree. LSR was a flow through but was originally classified as non-flow through. Did not fallout for manual handling. Re-run File classified as flow through: KPMGLSR2_0301_0331_2001lsr.xls
20	075012FPTF004012	00	9990	BUS	Agree.

EXCEPTION 86– Attachment One
BellSouth Florida OSS Testing Evaluation

Item #	PON	VER	CC	Level of Disaggregation	BellSouth's Findings
21	017021FPEN100002	00	9993	BUS	Agree.
22	017021FPEN100003	00	9993	BUS	Agree.
23	017021FPEN101001	00	9993	BUS	Agree.
24	017031FPEN000002	01	9993	BUS	Agree.
25	012021FPTN001002	00	9993	BUS	Do Not Agree. LSR was a flow through but was originally classified as non-flow through. Did not fallout for manual handling. Re-run File classified as flow through: KPMGLSR2_0301_0331_2001lsr.xls
26	017041FPEJ100004	00	9993	BUS	Agree.
27	017041FPEJ100005	00	9993	BUS	Agree.
28	017041FPEJ100008	00	9993	BUS	Agree.
29	020041FPTJ103011	00	9990	BUS	Do Not Agree. LSR was a flow through but was classified as non-flow through. Did not fallout for manual handling. File: KPMGLSR_0501_0531_2001.xls
30	002181FPEN100005	00	9990	BUS	Do Not Agree. LSR was a flow through but was classified as non-flow through. Did not fallout for manual handling. File: KPMGLSR_0401_0431_2001.xls
31	002181FPTN101016	00	9990	BUS	Do Not Agree. Invalid data populated in Feature Detail field by KPMG which caused fall out.
32	002181FPTN101017	00	9990	BUS	Do Not Agree. Invalid data populated in Feature Detail field by KPMG which caused fallout.
33	002181FPTN101018	00	9990	BUS	Do Not Agree. Invalid data populated in Feature Detail field by KPMG which caused fallout.

EXCEPTION 86— Attachment One

BellSouth Florida OSS Testing Evaluation

Item #	PON	VER	CC	Level of Disaggregation	BellSouth's Findings
34	002181FPTN103011	00	9990	BUS	Do Not Agree. LSR was a flow through and did not fall out for manual handling. File: KPMGLSR2_0301_0331_2001lsr.xls
35	002191FPTN101013	00	9990	BUS	Do Not Agree. Invalid data populated in Feature Detail field by KPMG which caused fallout.
36	013121FPTJ000009	00	9993	BUS	Do Not Agree. Planned fallout due to more than 25 lines.
37	013121FPTJ000010	00	9993	BUS	Do Not Agree. Planned fallout due to more than 25 lines.
38	013121FPTJ000012	00	9993	BUS	Do Not Agree. Planned fallout due to more than 25 lines.
39	013121FPTJ005011	00	9993	BUS	Do Not Agree. Invalid data populated in the LSO field by KPMG which caused fallout.
40	020041FPTJ100018	02	9990	BUS	Agree.
41	020081FPTJ000009	03	9990	BUS	Agree.
42	020081FPTJ001008	01	9990	BUS	Agree
43	002041FPTJ102010	00	9990	BUS	Do Not Agree. Invalid data populated in the LSO field by KPMG which caused fallout.
44	002201FPTJ100016	03	9990	BUS	Do Not Agree. Invalid request for conversion by KPMG who already owned account which caused fallout.
45	005081FPTJ103007	02	9990	BUS	Do Not Agree. Planned fallout for pending order review.
46	001051FPTJ100017	00	9990	BUS	Do Not Agree. Invalid data populated in Feature Detail field by KPMG which caused fallout.
47	001051FPTJ100022	00	9990	BUS	Agree.

EXCEPTION 86– Attachment One

BellSouth Florida OSS Testing Evaluation

Item #	PON	VER	CC	Level of Disaggregation	BellSouth's Findings
48	001051FPTJ101021	00	9994	BUS	Do Not Agree. LSR was a flow through and did not fall out for manual handling. File: KPMGLSR_0301_0331_2001.xls
49	001051FPTJ104018	00	9994	RES	Do Not Agree. LSR was a flow through and did not fall out for manual handling. File: KPMGLSR_0301_0331_2001.xls
50	010111FPEN100001	04	9993	RES	Do Not Agree. Invalid data populated in Feature Detail field by KPMG which caused fallout.
51	010121FPTN000002	00	9993	RES	Do Not Agree. LSR was a flow through but was classified as non-flow through. Did not fallout for manual handling. File: KPMGLSR_0501_0531_2001.xls
52	010121FPTN000002	01	9993	RES	Do Not Agree. LSR was a flow through but was classified as non-flow through. Did not fallout for manual handling. File: KPMGLSR_0501_0531_2001.xls
53	013011FPTN101010	00	9993	RES	Do Not Agree. Missing data in the LNECLS SVC field by KPMG which caused fallout.
54	017011FPTN103011	00	9993	RES	Do Not Agree. LSR was a flow through but was originally classified as non-flow through. Did not fallout for manual handling. Re-run File classified as flow through: KPMGLSR2_0301_0331_2001lsr.xls
55	017011FPTN104013	00	9993	RES	Do Not Agree. LSR was a flow through but was originally classified as non-flow through. Did not fallout for manual handling. Re-run File classified as flow through: KPMGLSR2_0301_0331_2001lsr.xls
56	016031FPTN001004	00	9993	RES	Do Not Agree. LSR was a flow through and did not fall out for manual handling. File: KPMGLSR_0501_0531_2001.xls

EXCEPTION 86– Attachment One
BellSouth Florida OSS Testing Evaluation

Item #	PON	VER	CC	Level of Disaggregation	BellSouth's Findings
57	016031FPTN002003	00	9993	RES	Do Not Agree. LSR was a flow through and did not fall out for manual handling. File: KPMGLSR_0501_0531_2001.xls
58	020021FPTN100013	02	9990	RES	Do Not Agree. LSR was a flow through and did not fall out for manual handling. File: KPMGLSR_0501_0531_2001.xls
59	020021FPTN100014	01	9990	RES	Do Not Agree. LSR was a flow through and did not fall out for manual handling. File: KPMGLSR_0501_0531_2001.xls
60	020021FPTN100017	01	9990	RES	Do Not Agree. LSR was a flow through and did not fall out for manual handling. File: KPMGLSR_0501_0531_2001.xls
61	020021FPTN100018	01	9990	RES	Do Not Agree. LSR was a flow through and did not fall out for manual handling. File: KPMGLSR_0501_0531_2001.xls
62	020021FPTN101016	02	9990	RES	Do Not Agree. LSR was a flow through and did not fall out for manual handling. File: KPMGLSR_0501_0531_2001.xls
63	005101FPTN102008	04	9990	RES	Do Not Agree. LSR was a flow through and did not fall out for manual handling. File: KPMGLSR_0501_0531_2001.xls
64	005101FPTN106009	00	9994	RES	Do Not Agree. LSR was a flow through and did not fall out for manual handling. File: KPMGLSR_0501_0531_2001.xls
65	001041FPTN101010	00	9994	RES	Do Not Agree. LSR was a flow through but was originally classified as non-flow through. Did not fallout for manual handling. Re-run File classified as flow through: KPMGLSR2_0301_0331_2001lsr.xls
66	001041FPTN101011	00	9990	RES	Do Not Agree. LSR was a flow through and did not fall out for manual handling. File: KPMGLSR_0401_0415_2001.xls

EXCEPTION 86– Attachment One
BellSouth Florida OSS Testing Evaluation

Item #	PON	VER	CC	Level of Disaggregation	BellSouth's Findings
67	001161FPTN101015	00	9990	RES	Do Not Agree. LSR was a flow through and did not fall out for manual handling. File: KPMGLSR_0401_0431_2001.xls
68	001161FPTN102010	00	9990	RES	Do Not Agree. LSR was a flow through but was originally classified as non-flow through. Did not fallout for manual handling. Re-run File classified as flow through: KPMGLSR2_0301_0331_2001lsr.xls
69	075021FPEF100002	03	9990	RES	Agree.
70	075021FPEF100003	02	9990	RES	Agree.
71	075021FPEF100004	01	9990	RES	Agree.
72	075021FPEF100005	01	9990	RES	Agree.
73	075021FPEF103001	02	9990	RES	Agree.
74	075021FPTF101009	00	9990	RES	Agree.
75	075021FPTF101011	00	9990	RES	Agree.
76	075021FPTF102007	00	9990	RES	Agree.
77	075021FPTF102008	00	9990	RES	Agree.
78	075021FPTF102010	03	9990	RES	Agree.
79	075021FPTF102012	02	9990	RES	Agree.
80	017011FPEN100001	00	9993	RES	Agree.
81	017011FPEN100002	00	9993	RES	Do Not Agree. LSR was a flow through but was originally classified as non-flow through. Did not fallout for manual handling. Re-run File classified as flow through: KPMGLSR2_0301_0331_2001lsr.xls

EXCEPTION 86– Attachment One
BellSouth Florida OSS Testing Evaluation

Item #	PON	VER	CC	Level of Disaggregation	BellSouth's Findings
82	017011FPEN100009	00	9993	RES	Do Not Agree. LSR was a flow through but was classified as non-flow through. Did not fallout for manual handling. File: KPMGLSR_0401_0431_2001.xls
83	017011FPEN101003	00	9993	RES	Do Not Agree. LSR was a flow through but was originally classified as non-flow through. Did not fallout for manual handling. Re-run File classified as flow through: KPMGLSR2_0301_0331_2001lsr.xls
84	016011FPEN100001	00	9993	RES	Agree.
85	016011FPEN100002	00	9993	RES	Agree.
86	016011FPEN100004	00	9993	RES	Agree.
87	016011FPEN100007	00	9993	RES	Agree.
88	016011FPEN100009	00	9993	RES	Agree.
89	016011FPEN100010	00	9993	RES	Agree.
90	016011FPEN100011	00	9993	RES	Agree.
91	016011FPEN100012	00	9993	RES	Agree.
92	016011FPEN100013	00	9993	RES	Agree.
93	016011FPEN100014	00	9993	RES	Agree.
94	016011FPEN100015	00	9993	RES	Agree.
95	016011FPEN100016	00	9993	RES	Agree.
96	016031FPEN001001	00	9993	RES	Agree.
97	016031FPEN001002	00	9993	RES	Agree.

EXCEPTION 86– Attachment One
BellSouth Florida OSS Testing Evaluation

Item #	PON	VER	CC	Level of Disaggregation	BellSouth's Findings
98	012081FPTN000009	00	9993	RES	Do Not Agree. LSR was a flow through and did not fall out for manual handling. File: KPMGLSR_0501_0531_2001.xls
99	012081FPTN000010	00	9993	RES	Do Not Agree. LSR was a flow through and did not fall out for manual handling. File: KPMGLSR_0501_0531_2001.xls
100	012081FPTN000011	00	9993	RES	Do Not Agree. LSR was a flow through and did not fall out for manual handling. File: KPMGLSR_0501_0531_2001.xls
101	012081FPTN000012	00	9993	RES	Do Not Agree. LSR was a flow through and did not fall out for manual handling. File: KPMGLSR_0501_0531_2001.xls
102	012081FPTN001008	00	9993	RES	Do Not Agree. LSR was a flow through and did not fall out for manual handling. File: KPMGLSR_0501_0531_2001.xls
103	013101FPEJ100003	00	9993	RES	Do Not Agree. Invalid data populated in the LSO field by KPMG which caused fallout.
104	017061FPEJ100003	00	9993	RES	Agree.
105	017061FPEJ100006	00	9993	RES	Agree.
106	017061FPEJ101005	00	9993	RES	Agree.
107	013011FPTN100006	00	9993	RES	Do Not Agree. Missing data in the LNECLS SVC field by KPMG which caused fallout.
108	013011FPTN100007	00	9993	RES	Do Not Agree. Missing data in the LNECLS SVC field by KPMG which caused fallout.
109	018051FPTJ000018	00	9993	RES	Do Not Agree. Invalid data populated in the LSO field by KPMG which caused fallout.
110	020051FPTJ100012	02	9990	RES	Do Not Agree. Invalid data populated in the directory listing by KPMG which caused fallout.

EXCEPTION 86– Attachment One

BellSouth Florida OSS Testing Evaluation

Item #	PON	VER	CC	Level of Disaggregation	BellSouth's Findings
111	020051FPTJ100013	01	9990	RES	Do Not Agree. Invalid data populated in the directory listing by KPMG which caused fallout.
112	020051FPTJ102011	01	9990	RES	Do Not Agree. Invalid data populated in the directory listing by KPMG which caused fallout.
113	020051FPTJ104010	03	9990	RES	Do Not Agree. LSR was a flow through and did not fall out for manual handling. File: KPMGLSR_0501_0531_2001.xls
114	002121FPTJ100012	00	9990	RES	Do Not Agree. LSR was a flow through and did not fall out for manual handling. File: KPMGLSR_0401_0430_2001.xls
115	002121FPTJ101013	00	9990	RES	Do Not Agree. Invalid data populated in the LSO field by KPMG which caused fallout.
116	002121FPTJ101014	01	9990	RES	Do Not Agree. LSR was a flow through and did not fall out for manual handling. File: KPMGLSR_0501_0531_2001.xls
117	002121FPTJ101015	01	9990	RES	Do Not Agree. LSR was a flow through and did not fall out for manual handling. File: KPMGLSR_0501_0531_2001.xls
118	002141FPTJ001013	00	9990	RES	Do Not Agree. Invalid data populated in the Feature Detail field by KPMG which caused fallout.
119	002141FPTJ002015	00	9990	RES	Do Not Agree. Invalid data (LNA V) populated by KPMG which caused fallout.
120	002211FPTJ100012	01	9990	RES	Agree.
121	001061FPTJ100018	00	9990	RES	Do Not Agree. LSR was a flow through and did not fall out for manual handling. File: KPMGLSR_0401_0415_2001.xls

EXCEPTION 86– Attachment One
BellSouth Florida OSS Testing Evaluation

Item #	PON	VER	CC	Level of Disaggregation	BellSouth's Findings
122	001061FPTJ100023	00	9990	RES	Do Not Agree. LSR was a flow through and did not fall out for manual handling. File: KPMGLSR_0401_0415_2001.xls
123	001061FPTJ100025	00	9990	RES	Do Not Agree. LSR was a flow through and did not fall out for manual handling. File: KPMGLSR_0401_0415_2001.xls
124	001061FPTJ101020	00	9990	RES	Do Not Agree. LSR was a flow through and did not fall out for manual handling. File: KPMGLSR_0401_0415_2001.xls
125	001081FPEJ100001	01	9990	RES	Do Not Agree. Planned manual fallout. File: KPMGLSR_0528_0603_2001.xls
126	001081FPEJ100002	01	9990	RES	Do Not Agree. Planned manual fallout. File: KPMGLSR_0528_0603_2001.xls

FLORIDA OSS BELLSOUTH'S RESPONSE TO EXCEPTION 86



Florida OSS Test
Exception #86

Date: August 23, 2001

EXCEPTION REPORT

KPMG Consulting has identified an exception as a result of the Order "Flow Through" Evaluation (TVV-3).

Exception:

KPMG Consulting did not receive flow through Firm Order Confirmations (FOC) on Local Service Requests (LSR) submitted electronically via the mechanized ordering process. (TVV3)

Issue:

According to Ordering O-3 of the Service Quality Measurement Plan¹, BellSouth should issue a flow through FOC on 95% of residential and 90% of business LSRs submitted through mechanized ordering processes. During production testing of the TAG, EDI and LENS interfaces, a number of LSRs submitted by KPMG Consulting fell out for manual intervention.

The following are the results that KPMG Consulting received as of June 29, 2001 on residential and business LSRs. The number of transactions specifically excludes fatal rejects, auto clarifications, CLEC system fallout and planned manual fallouts for complex orders.

	Residential	Business
Number of Transactions	503	438
Number of Flow Through FOCs	426	389
Percent	85%	89%

Please refer to *FLA Exception 86 Attachment One* for LSRs which fell out for manual intervention.

¹ BellSouth OSS Testing Florida Interim Performance Metrics Ver. 3.0, Approved by Florida PSC June 12, 2001

FLORIDA OSS BELLSOUTH'S RESPONSE TO EXCEPTION 86

Impact:

Flow through LSRs are a critical factor in the CLEC's delivery of service to customers.

BellSouth's Response:

BellSouth's findings for each PON are included in the Attachment One table. In summary, BellSouth's investigation has found:

Business:

Agree with KPMG Findings	18
Disagree with KPMG Findings	
Eligible for 03*	18
Ineligible for 03*	12
 Total LSRs	 48

Therefore, the results for Business Flow Through are:

Number of Transactions	$438 - 12 = 426$
Number of Flow Through FOCs	$389 + 18 = 407$
Percent	96%

Residence:

Agree with KPMG Findings	30
Disagree with KPMG Findings	
Eligible for 03*	34
Ineligible for 03*	14
 Total LSRs	 78

Therefore, the results for Residence Flow Through are:

Number of Transactions	$503 - 14 = 489$
Number of Flow Through FOCs	$426 + 34 = 460$
Percent	94%

*03 = Flow through FOC Measurement

BellSouth will correctly classify the few flow through LSRs that were mistakenly classified as non-flow through. BellSouth is presently researching the date for this fix. BellSouth has also opened defects to correct issues with residence LSRs that fell out for manual handling. These defects are scheduled to be worked in September, 2001.